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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

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11 SOFIA VELADORES, individually, and as
special administrator of the ESTATE OF
12 ROBERTO SANCHEZ, and as Guardian ad
Litem of D.S. and I.S. and Rogelio Sanchez,
individually,

13 Plaintiff,

14 vs.

15 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of the
16 State of Nevada; OFFICER SOLON
MCGILL, individually; DOES I through 10,
17 inclusive;

18 Defendants.

CASE NO. 2:17-cv-0062-RFB-VCF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(FIFTH REQUEST)

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20 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of
21 record, hereby stipulate and request that this Court extend discovery in the above-captioned case
22 ninety (90) days, up to and including October 8, 2018. In addition, the parties request that the
23 dispositive motions and pretrial order deadlines be extended for an additional ninety (90) days as
24 outlined herein. In support of this Stipulation and Request, the parties state as follows:

- 25 1. On November 23, 2016, Plaintiff filed her Complaint in Nevada District Court.
26 2. On January 6, 2017, Defendant filed their Petition for Removal with Federal Court.
27 3. On January 13, 2017, Defendants filed their Answer to Plaintiff's Complaint with
28 Federal Court.

4. On February 6, 2017 the parties submitted a proposed Scheduling Order to the Court.

5. On January 24, 2017, Plaintiff served her Initial Disclosure of Documents and Witnesses on Defendants.

6. On April 21, 2017, Defendant served its Initial Disclosure of Documents and Witnesses on Defendants.

7. On May 23, 2017, Defendant served written discovery on Plaintiffs. Plaintiffs served their responses on August 23, 2017.

8. On June 2, 2017, Plaintiff served written discovery on Defendants. Defendants served their responses on September 8, 2017.

9. On November 22, 2017, a protective order was entered in this matter.

DISCOVERY REMAINING

1. Defendants will take the deposition of Plaintiffs in late May/early June.

2. Plaintiff will take deposition of Officer McGill on May 10, 2018.

3. The parties will complete all written discovery.

4. The parties will take the depositions of the designated expert witnesses.

5. The parties will take the depositions of any and all other witnesses garnered through discovery.

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to conduct discovery.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

The parties have been compiling documents and investigating the instant action. The parties are actively engaged in written discovery and will proceed with the necessary case depositions.

Counsel for Defendants has been preparing for trials both scheduled to commence on May 7, 2018 in *Kathryn Kingham vs. State Farm Mutual Automobile Insurance Company*, 2:15-cv-01555-APG-GWF, and in *Austin Stephan vs. State Farm Mutual Automobile Insurance Company*,

CV16-01846. Both cases have recently scheduled, however, significant time was spent over the past sixty days preparing for the trials. In addition counsel for defendants is preparing appellate reply briefings in *City of North Las Vegas adv. Mitchell*, 17-16552 and *Weathers v. Clark County Detention Center*, et al, 17-17074. Finally, counsel has been out of town attending to a family matter.

In addition, Defendant Officer Solon McGill was deployed in the middle east from February 2017 until February 2018. Officer McGill is still on active duty out of the state of Nevada, however, is able to travel to Nevada for his deposition in May, 2018.

Counsel for Plaintiff has been compiling documents and investigating the instant action, and is currently working with consultants to act as experts, who will author reports.

Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-4 governs modifications or extension of this discovery plan and scheduling order. Any stipulation or motion must be made no later than twenty-one (21) days before the expiration of the subject deadline, and comply fully with LR 26-4.

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to conduct discovery regarding offsets in this case and adequately prepare their respective cases for trial.

This is the fifth request for extension of time in this matter. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the short extension.

The following is a list of the current discovery deadlines and the parties' proposed extended deadlines.

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	Monday, July 9, 2018	Monday, October 8, 2018
Amendment to Pleadings	Closed	Closed
Interim Status Report	Monday, May 10, 2018	Wednesday, August 8, 2018

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Expert Disclosure pursuant to Fed R. Civ. P. 26 (a)(2)	Tuesday, May 10, 2018	Wednesday, August 8, 2018
Rebuttal Expert Disclosure pursuant to Fed. R. Civ. P. 26(a)(2)	Monday, June 11, 2018	Friday, September 9, 2018
Dispositive Motions	Wednesday, August 8, 2018	Wednesday, November 7, 2018, or at least thirty (30) days after the close of discovery
Joint Pretrial Order	Monday, September 7, 2018	Friday, December 7, 2018, or at least thirty (30) days after the decision of last Dispositive Motions

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WHEREFORE, the parties respectfully request that this Court extend the discovery period by ninety days (90) days from the current deadline of July 9, 2018 up to and including October 8, 2018 and the other discovery dates as outlined in accordance with the table above.

DATED this 19th day of April, 2018.

DATED this 19th day of April, 2018.

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ORDER

IT IS SO ORDERED.

Dated this 19th day of April, 2018.

Cam Buckner

U.S. MAGISTRATE JUDGE